

**CRUSER, MITCHELL, NOVITZ, SANCHEZ, GASTON & ZIMET, LLP**

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*NJ Transit Bus Operations Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

SINOWA JOHNSON,

Plaintiff,

v.

NJ TRANSIT BUS OPERATIONS INC. d/b/a/  
NJ TRANSIT AND ATU LOCAL 880,

Defendants.

Hon. Karen M. Williams, U.S.D.J.

Hon. Elizabeth A. Pascal, U.S.M.J.

Civil Action No. 1:25-02528 (KMW/EAP)

**NOTICE OF MOTION**

**TO:** Hon. Elizabeth A. Pascal, U.S.M.J.  
United States District Court  
Mitchell H. Cohen U.S. Courthouse  
4<sup>th</sup> & Cooper Streets, Courtroom 4A  
Camden, New Jersey 08101

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**PLEASE TAKE NOTICE** that on **Tuesday, September 2, 2025**, or as soon thereafter as counsel may be heard, Cruser, Mitchell, Novitz, Sanchez, Gaston & Zimet, LLP (Travis M. Anderson, Esq., appearing), attorneys for Defendant, New Jersey Transit Bus Operations, Inc. (“Defendant”), will apply to the Honorable Elizabeth A. Pascal, U.S.M.J., staying the within matter until Defendant’s pending Motion to Dismiss (ECF No. 13), and for further relief as the Court may deem proper in this matter.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Rule 1:6-2, Defendant respectfully requests that the Court consider this motion on the papers submitted unless opposition is timely entered, in which case oral argument is requested.

**PLEASE TAKE FURTHER NOTICE** that, in support of their motion, Defendant will rely upon the attached Letter Brief, Certification of Counsel, and Exhibits.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**Discovery End Date:** None

**Arbitration Date:** None

**Trial Date:** None

**CRUSER, MITCHELL, NOVITZ, SANCHEZ,  
GASTON & ZIMET, LLP**

By: /s/ Travis M. Anderson  
Travis M. Anderson, Esq.

Dated: August 8, 2025